

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IpLEARN, LLC, a California Limited)	
Liability Company,)	C.A. No. 11-825-LPS
)	
Plaintiff,)	JURY TRIAL DEMANDED
)	
v.)	
)	
WBT SYSTEMS, LTD, <i>et al.</i> ,)	
)	
Defendants.)	

CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed. R. Civ. P. 7.1(a), the undersigned counsel for Defendant Element K Corporation states that Element K Corporation is a non-governmental corporation and that Element K Corporation is a wholly-owned subsidiary of SkillSoft Corporation, which is a wholly-owned subsidiary of SkillSoft Limited (formerly SkillSoft PLC) ("SkillSoft Limited"). No publicly held corporation owns 10% or more of SkillSoft Limited's stock.

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Andrew P. Zappia
Wendell W. Harris
LeClairRyan
290 Linden Oaks
Suite 310
Rochester, NY 14625
(585) 270-2100

Dated: November 1, 2011
1033523

By: /s/ Philip A. Rovner
Philip A. Rovner (#3215)
Jonathan A. Choa (#5319)
Hercules Plaza
P.O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com
jchoa@potteranderson.com

*Attorneys for Defendant
Element K Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Philip A. Rovner, hereby certify that on November 1, 2011, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

BY CM-ECF AND E-MAIL

Arthur G. Connolly, III, Esq.
Kristen Healey Cramer, Esq.
Jeremy D. Anderson, Esq.
Connolly Bove Lodge & Hutz LLP
The Nemours Building
1007 North Orange Street
Wilmington, DE 19801
aconnollyIII@cblh.com
kcramer@cblh.com
janderson@cblh.com

*Attorneys for Plaintiff
IpLearn LLC*

Mary B. Graham, Esq.
Morris, Nichols, Arsht & Tunnell LLP
1201 N. Market Street
P. O. Box 1347
Wilmington, DE 19899-1347
mgraham@mnat.com

*Attorneys for Defendant
Oracle Corporation*

Daniel M. Silver, Esq.
McCarter & English, LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801
dsilver@mccarter.com

*Attorneys for Defendant
Connections Education, LLC*

John W. Shaw, Esq.
Shaw LLC
800 Delaware Avenue, 4th Floor
Wilmington, DE 19801
jshaw@shawllp.com

*Attorneys for Defendant
Pearson, Inc.*

Richard D. Kirk, Esq.
Stephen B. Brauerman, Esq.
Bayard, P.A.
222 Delaware Avenue, Suite 900
P. O. Box 25130
Wilmington, DE 19899
rkirk@bayardlaw.com
sbraerman@bayardlaw.com

*Attorneys for Lumesse, AS, Lumesse, Inc. and
Cengage Learning Inc.*

Karen L. Pascale, Esq.
Young Conaway Stargatt & Taylor LLP
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, DE 19801
kpascale@ycst.com

*Attorneys for Defendant
Trivantis Corporation Inc.*

William J. Wade, Esq.
Richards Layton & Finger, P.A.
One Rodney Square
920 N. King Street
Wilmington, DE 19801
wade@rlf.com

*Attorneys for Defendant
Beeline Acquisition Corp.*

/s/ Philip A. Rovner
Philip A. Rovner (#3215)
Potter Anderson & Corroon LLP
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899
(302) 984-6000
provner@potteranderson.com